

Compliance Assessment Report CAR_NRW0040180

Permit being assessed: BR9383ID.

For: Queensferry Mineral Fibre Works , held by Knauf Insulation Ltd
At: Chemistry Lane , Queensferry, Deeside, Flintshire, CH5 2DA.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 26/07/2022 between 10:10 and 15:00.

Parts of permit assessed: Emissions Monitoring and Containment of Waste Materials

NRW Lead Officer: Stuart Ross, accompanied by Paul Challender.

Report sent to: Graham Jones, Environment Energy & Compliance Manager on 28/07/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	C3 Minor	3.2.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
B4	Refer details section (3 Actions listed).	12/08/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This Compliance Assessment Report follows a planned inspection of the QAL2 exercise performed on Emission Point A (Cupola).

NRW verified that the operator's appointed MCERTs test laboratory (Element - UKAS 4279) was in the process of completing a QAL 2 stack sampling exercise in accordance with the requirements of the agreed Site Specific Protocol (SSP) v2 dated 21 July 2022.

The SSP has been agreed by the operator via email exchange but it is best practice for the document to be signed and dated by both parties. The MCERTs Team Leader presented a copy of the correct version of the SSP on request.

Stack gas sampling was being performed at the required location using a Horiba 250 mobile CEM.

Extractive particulate and sulphur dioxide sampling was also being carried out concurrently using an isokinetic sample probe with inline filter and ice cooled impingers respectively 45 minute runs (3x 5 minute samples at 3 positions on 3 ports) were being performed as specified in the SSP

Where visible/available instrument calibration stickers and certificates were inspected and were valid. Valid test gas calibration certificates were attached to cylinders.

The MCERTS team leader present confirmed that functional tests had been completed on the CEMS by a third party and information has been received from Knauf Insulation for inclusion in the QAL2 report.

Stack emissions monitoring personnel present consisted of one Team Leader (MCERTS Level 2) and one Technician (Level 1). Identities were confirmed as per those detailed in the SSP.

The Team Leader's identity card has expired but technical endorsements were checked and are valid. The Team Leader reported that the reason for card expiry is linked to a H&S training certificate that expired April 2022 but refresher training was completed March 2022 - the MCERTs identity card needs to be re-issued to reflect this and advice is being sought from his line management.

The CEMS room was accessed during the audit and data was being collected as normal. A comparison of two periods of CEM and SRM data was completed and values were significantly different.

The process control room was visited and the plant operator reported that the process (cupola) had been operating as normal throughout the morning.

QAL2 report to be issued to NRW as per the requirements set out in the previous Compliance Assessment Report.

Waste Storage

Whilst on site a plant familiarisation walk was carried out.

It was observed that waste fibre (including uncured fibre) from the process was stockpiled close to the site boundary fence adjacent to the Ceilcote scrubber and waste water treatment process.

Fibre has escaped the containment of the yard and push walls and spilt onto unmade ground along the site boundary fence that is immediately next to a watercourse. There is therefore no control measure in place to prevent spilt fibre and binders contaminating the ground and surface water.

This is in breach of permit condition 3.2.1 and attracts a non compliance score of 3.

Action 1 - As discussed, please remove spilt fibre from areas outside of the curbed concrete yard area and provide NRW with photographs to confirm this has been completed by 12/08/22.

Action 2 - review waste fibre storage arrangements/infrastructure to prevent a recurrence of this incident. Provide NRW with a copy of your review and improvement measures (including associated timescales for completion) by 30/09/22.

Action 3 - review procedures for waste storage and clean up of overspill incidents. Please provide a copy of your review and associated procedure by 30/09/22.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.